

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

MARKS ONE CAR RENTAL, INC.

Plaintiff,

Case No. 13-CV-14610-rsw

Honorable: Avery Cohn

vs.

AUTO CLUB GROUP INSURANCE COMPANY, a Michigan insurance entity; THE FARMERS AUTOMOBILE INSURANCE ASSOCIATION, an Illinois insurance entity; BRISTOL WEST INSURANCE COMPANY, an Ohio insurance entity; HELPPPOINT CLAIM SERVICES, an Illinois corporation; 21st CENTURY INSURANCE COMPANY, a California insurance entity; CITIZENS INSURANCE COMPANY OF AMERICA, a Michigan insurance entity; NATIONWIDE INSURANCE COMPANY OF AMERICA, a Wisconsin insurance entity; TITAN Insurance company, a Michigan insurance entity; ALLIED INSURANCE COMPANY OF AMERICA, an Ohio insurance entity; FOREMOST INSURANCE COMPANY GRAND RAPIDS MICHIGAN, a Michigan insurance entity; THE HERTZ CORPORATION, a Delaware Corporation; and ENTERPRISE LEASING COMPANY OF DETROIT, a Michigan Corporation,

Defendants.

CHARLES T. BUSSE (P49770)
BALIAN & BUSSE, PLC
Attorney for Plaintiff
811 S. Boulevard E.
Suite 200
Rochester Hills, MI 48307
(248) 402-0000

ABE M. BARLASKAR (P75171)
GREGORY GROMEK (P30164)
CHIARA MATTIESON (P64390)
PLUNKETT COONEY
Attorneys for Defendant
38505 Woodward Ave.
Suite 2000
Bloomfield Hills, MI 48304
(248) 901-4000

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AMANDA A. KILL (P68988)
JOSEPH A. AHERN (P38710)
AHERN & KILL
Attorneys for Plaintiff
430 N. Old Woodward, Second Floor
Birmingham, MI 48009
(248) 723-6101

DONALD C BROWNELL (P48848)
VANDEVEER GARZIA
Attorney for Defendant
1450 W. Long Lake Rd.
Suite 100
Troy, MI 48098-6330
(248) 312-2800

BENJAMIN W. JEFFERS (P57161)
DYKEMA GOSSETT
Attorney for Defendant
400 Renaissance Center
Detroit, MI 48243-1668
(313) 586-6800

CHERYL A. BUSH (P37031)
BUSH, SEYFERTH & PAIGE, PLLC
Attorney for Defendant
3001 W. Big Beaver Road
Suite 600
Troy, MI 48084
(248) 822-7800

LORI M. MCALLISTER (P39501)
DYKEMA GOSSETT
Attorney for Defendant
201 Townsend
Capital View Building
Suite 900
Lansing, MI 48933-1551
(517) 374-9100

MICHAEL P. COAKLEY (P35478)
SAMANTHA GALECKI (P74496)
MILLER, CANFIELD
Attorneys for Defendant
150 W. Jefferson Avenue
Suite 2500
Detroit, MI 48226-4415
(313) 496-7531

PAUL D. HUDSON (P56984)
MILLER, CANFIELD, PADDOCK &
STONE, P.L.C.
Attorney for Defendant
277 S. Rose Street
Suite 5000
Kalamazoo, MI 49007
(269) 383-5805

**RESPONSE TO DEFENDANTS NATIONWIDE INSURANCE
COMPANY OF AMERICA, TITAN INSURANCE COMPANY, AND ALLIED
INSURANCE COMPANY OF AMERICA'S MOTION TO DISMISS THE COMPLAINT**

Plaintiff, Marks One Car Rental, Inc., through its attorneys, Ahern & Kill and Balian & Busse, PLC, respectfully requests that this Court deny all relief sought in Defendants Nationwide Insurance Company of America, Titan Insurance Company, and Allied Insurance Company of

America's Motion to Dismiss the Complaint, for the reasons set forth in the accompanying Brief in Support of its Response to Defendants Nationwide Insurance Company of America, Titan Insurance Company, and Allied Insurance Company of America's Motion to Dismiss the Complaint

Respectfully submitted,

/s/ Charles T. Busse
Charles T. Busse (P49770)
Attorney for Plaintiff
811 South Blvd E., Suite 200
Rochester Hills, Michigan 48307
(248) 402-0000
chuck@busselaw.com

and

AHERN KILL

/s/ Amanda A. Kill
AMANDA A. KILL (P68988)
Attorney for Plaintiff
430 N. Old Woodward, Second Floor
Birmingham, MI 48009

January 8, 2014

AHERN & KILL P.C. ATTORNEYS AND COUNSELLORS 430 N OLD WOODWARD AVE SECOND FLOOR BIRMINGHAM, MICHIGAN 48009 (248) 723-6101